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Attorneys for Defendants
 COUNTY OF SANTA CLARA,
 LONGORIA, MERINO, DAVIS,
 CARDENAS, MORENO, and
 OBERLANDER (Moreno and Oberlander in
 Case No. C05-01945 only)

UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 (San Jose)

GIUSEPPE "NINO" CAMPANELLA,
 et al.,

Plaintiffs,

v.

JEFFREY LONGORIA, et al.,

Defendants.

No. C04 04906 RS

Consolidated with Case No. C05-01945 RS

**STIPULATION AND ORDER TO EXTEND
 DEADLINE FOR DEFENDANTS TO
 DISCLOSE EXPERT TESTIMONY AND
 REPORTS**

AFFIDAVIT

I Steve Schmid declare:

1. I am an attorney licensed to practice law before the courts of the State of California and am admitted to practice in the United States District Court for the Northern District of California. I am employed as a Deputy County Counsel by the Santa Clara County Office of County Counsel, attorney of record for Defendants herein.

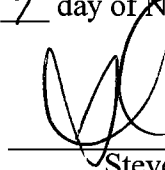
2. On March 16, 2007 United States Magistrate Judge Richard Seeborg issued a case management order setting this consolidated proceeding for trial to commence on April 7, 2008. In the case management order deadlines for discovery, expert testimony and report disclosure and other matters were set as well.

1 3. The March 16, 2007 case management order requires Defendants to disclose expert
2 testimony and reports on or before January 2, 2008. Expert discovery cut-off was set for
3 February 4, 2008. Discovery cut-off was set for November 5, 2007. Subsequently, Judge
4 Seeborg extended discovery cut-off to November 15, 2007 by minute order.

5 4. On September 21, 2007, Defendants noticed resumption of depositions of Plaintiffs
6 Lynette and Giuseppe Campanella for October 31, 2007 and November 2, 2007. In mid-
7 October 2007 Plaintiff's attorney confirmed with Defendants' attorney's office that these dates
8 were fine. On October 30, 2007, Plaintiffs requested Defendants to continue both depositions.
9 The parties were unable to agree on an alternate course until the following day when it was
10 agreed that the depositions could be continued so long as it was agreed that the deadline for
11 disclosure of Defendants' expert testimony and reports would be extended by an equal amount
12 of days of delay with respect to resumption of Plaintiffs' depositions.

13 5. Defendants intend to disclose six expert witnesses. The experts' testimony and
14 reports will be based upon discovery materials including, importantly, the transcripts of
15 Plaintiffs' depositions. These depositions will each last at least one full day. Because of
16 Defendants' attorney's calender, it appears that these depositions will now occur on November
17 19, 2007 and November 20, 2007. Being that the depositions were properly noticed for October
18 31, 2007 and November 2, 2007 and the continuance being for the sole benefit of Plaintiffs,
19 both sides view it as fair to extend Defendants' deadline to disclose expert testimony and
20 reports for eighteen (18) days.

21 I declare under penalty of perjury that the foregoing is true and correct and if called upon
22 to testify, I could do so competently. Executed this 9 day of November 2007 at San Jose,
23 California.

24 
25 _____
Steve Schmid

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STIPULATION

In that Defendants have agreed to continue resumption of Plaintiffs Lynette and Giuseppe Campanella's depositions for the convenience of Plaintiffs from October 31, 2007 and November 2, 2007, respectively, to November 19, 2007 and November 20, 2007,

1. It is stipulated that Defendants' deadline for disclosing expert testimony and reports for a period of eighteen (18) days, from January 2, 2008 to January 20, 2008;

2. It is further stipulated that should Plaintiffs require additional time to depose Defendants' experts, they will be accorded an additional eighteen days beyond the current deadline of February 4, 2008; i.e., until February 22, 2008.

ANN MILLER RAVEL
County Counsel

Dated: November 7, 2007

By:

STEPHEN H. SCHMID
Deputy County Counsel

Attorney for Defendants
COUNTY OF SANTA CLARA,
LONGORIA, MERINO, DAVIS,
CARDENAS, MORENO, AND
OBERLANDER (Moreno and Oberlander
in Case No. C05-01945 only)

Dated: November 7, 2007

By:

ADAM R. BERNSTEIN

Attorney for Plaintiffs
GIUSEPPE and LYNETTE
CAMPANELLA

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 11/13/07

RICHARD SEEBORG
United States Magistrate Judge